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Of Attorneys for City of Brookings Defendants

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

MEDFORD DIVISION

JENNIFER GAYMAN,

Plaintiff,

v.

CITY OF BROOKINGS; BROOKINGS
POLICE DEPARTMENT; BROOKINGS
POLICE CHIEF KELBY MCCRAE;
OFFICER RAY MARRINGTON;
OFFICER BRYAN BROSE;
OFFICER TOBIAS CHITTOCK;
OFFICER MITCHELL POFAHL, and
EVERETT DIAL,

Defendants.

Case No.: 1:20-cv-00440-CL

**DEFENDANTS CITY OF
BROOKINGS' OBJECTIONS TO
PLAINTIFF'S EXHIBITS**

Defendants City of Brookings object to the following exhibits submitted by Plaintiff:

1. Plaintiff's Exhibit 1:

Defendants object to Exhibit 1 as it is hearsay under FRE 801. Defendants further object because Plaintiff has not disclosed Sharmeen Nelson, M.D. as an expert under Rule 26.

2. Plaintiff's Exhibit 2:

Defendants object to Exhibit 2 as it is hearsay under FRE 801. Defendants further object because Plaintiff has not disclosed Katherine Austin, P.A. as an expert under Rule 26.

3. Plaintiff's Exhibit 9:

Defendants object to Exhibit 9 as it is hearsay under FRE 801. Defendants further object because Plaintiff has not disclosed Sharmeen Nelson, M.D. or Howard Croy, P.A. as experts under Rule 26.

4. Plaintiff's Exhibit 14:

Defendants object to Exhibit 14 as it is hearsay under FRE 801.

5. Plaintiff's Exhibit 15:

Defendants object to Exhibit 15 as it does not contain relevant evidence under FRE 401. Defendants further object to this exhibit as it is hearsay under FRE 801.

6. Plaintiff's Exhibit 17:

Defendants object to Exhibit 17 as it is hearsay under FRE 801.

DATED this 31st day of December, 2021.

FROHNMAYER, DEATHERAGE, JAMIESON,
MOORE, ARMOSINO & McGOVERN, P.C.

s/ Thomas F. Armosino

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TRIAL ATTORNEY

Of Attorneys for Defendants City of Brookings

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DEFENDANTS CITY OF BROOKINGS' OBJECTIONS TO PLAINTIFF'S EXHIBITS** upon:

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By automatic electronic transmission via the Court's Case Management/Electronic Case Files system.

Dated this 31st day of December, 2021.

FROHNMAYER, DEATHERAGE, JAMIESON,
MOORE, ARMOSINO & McGOVERN, P.C.

s/ Thomas F. Armosino

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